Writing the IEE (EPTM Chapter 4)



IEE Review

Used when at least one screening outcome is "IEE required"

♦ An IEE:

- Is the first review of foreseeable effects on the environment of a proposed action
- Indicates whether significant adverse impacts are expected/possible
 - → If yes, an EA will be required
- Identifies mitigation and monitoring actions needed



Review: IEE outcomes

IEE Outcome

Activity has no significant adverse environmental impact

With adequate mitigation and monitoring, activity has no significant environmental impact

Activity has significant — adverse environmental impact

Not enough information to evaluate impacts

Meaning/Implication



Project has passed environmental review

By adding mitigation to project design, project passes environmental review

Do full EA or redesign project

Must finalize IEE before you can spend USAID funds

THRESHOLD DECISIONS

USAID terms



"NEGATIVE DETERMINATION"

"NEGATIVE DETERMINATION WITH CONDITIONS"

"POSITIVE DETERMINATION"

"DEFERRAL"



IEE

Writing the IEE

The Basic IEE Outline

- Basic Information: Program/Project Data: Program/Activity: USAID Partner Name, Country/Region:
- 1 Background and Activity Description
 - 1.1 Background; 1.2 Description of Activities;
 - 1.3 Purpose and Scope of IEE
- 2 Country and Environmental Information (Baseline Information)
 - 2.1 Locations Affected
 - 2.2 National Environmental Policies and Procedures
- **♦ 3 Evaluation of Environmental Impact Potential**
- 4 Recommended Determinations and Mitigation Actions (Including Monitoring and Evaluation)
 - 4.1 Recommended IEE Determinations (includes justification of categorical exclusions identified during screening)
 - 4.2 Mitigation, Monitoring and Evaluation
 - 4.3 Summary table



IEE Preparation: Overview

- Steps in preparing an IEE are:
 - Locate your summary table
 - Decide the type of IEE you will write
 - Assemble information
 - Conduct the environmental analysis
 - Consider threshold decisions
 - Finalize decisions and write mitigation and monitoring plan
 - Write summary and compliance facesheet



Before you begin. . .

- Find your summary table!
 - Summary info and screening outcomes are filled in already

Activity type or description	Geographic Distribution, Location	Sites/Projects (number, geographic division)	Scale & Quantity of Activity	Unit [ha, etc.]	Screening outcome	Recommended IEE Threshold Decision
IR 1:						
Subtotal (% of total	l budget)					
IR 2:						
Subtotal (% of total	al budget)					
Subtotal (% of total	al budget)					



Step 1: Decide the type of IEE you will write

If your situation is	Type of IEE		
Well-defined, closely related activities at one site	Basic or "classic" IEE		
Well-defined, closely related activities at multiple sites	Multi-site IEE		
Some activities not yet fully defined	IEE with deferral		
Multiple sets of dissimilar activities at one or more sites	IEE with separate sectoral write-ups		
Multiple activities not yet fully defined, and mostly small-scale (e.g., subgrants, community-defined activities)	Umbrella IEE		



Step 1: Decide the type of IEE you will write

- Notes regarding the umbrella IEE:
 - Applies when:
 - → Activities are mostly Small-Scale; communities define and help design activities; partners submit subgrant proposals
 - Entails a post-IEE environmental screening and review process
 - → See EPTM Annex F
 - "Umbrella" may be applied to only a portion of the IEE, or to all activities



Step 2: Assemble information resources

- Locate key environmental and natural resources data
- Socio-economic and cultural information
- Maps!



- ♦ This is Sections 1-3 of the IEE outline
- Section 1: Background and Description
 - Background/rationale/description
 - Description of activity (ies)
 - Purpose and scope of IEE

Recommended: organize the description of your activities identically to your summary table



- Section 2: Country and Environmental Information
 - Location Affected
 - → Describe the affected environment, including physical, biological, health, socio-economic, and cultural aspects
 - Environmental Policies and Procedures of the Host Country

Note: Organize this section by **location** or **activity**, whichever is most convenient



- Section 3: Evaluation of Environmental Impact Potential
 - Describe impacts for each activity, using the same organizational framework you adopted for IEE Section 1
 - If an activity has no potential impact, or a component may be a Categorical Exclusion, briefly note this

Impact (or LEOPOLD) matrices are recommended



- Evaluating environmental impacts requires you to judge their SIGNIFICANCE
- Depends on 2 factors:
 - Context
 - Intensity
- A value judgment. Reflects policies, local values, laws.



Step 4: Consider Recommended Threshold decisions

EACH activity requires a threshold decision:

Threshold decision	What it means
Negative determination	Routine and low-risk activity, no significant adverse impact expected.
Negative determination with conditions	With appropriate mitigation and monitoring, the proposed activity will result in no significant adverse effects.
Positive determination	The activity has the potential for creating significant adverse effects. An EA is required.
Deferral	Not enough information is available to determine likely impacts.



Step 4: Consider Recommended Threshold decisions

- Notes regarding deferrals:
 - Appropriate when IEE is for a project with multiple activities AND some activities are not defined yet
 - Deferred activity cannot proceed until deferral is resolved
 - Only an amended IEE can resolve a deferral
 - IEE which recommends deferral MUST:
 - Explain WHY the IEE cannot be completed;
 - estimate time required to complete the IEE



Step 4: Consider Recommended Threshold decisions

- Notes regarding potential positive determinations:
 - Again, requires a professional team, significant resources and time
 - Therefore, consult with the Mission and BEO in ADVANCE regarding a possible positive determination



Step 5: Finalize threshold decisions, identify mitigation and monitoring

This covers Section 4 of the IEE

 First, Finish your summary table! (helps organize your writing)

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Activity type or description	Geographic Distribution, Location	Sites/Projects (number, geographic division)	Scale & Quantity of Activity	Unit [ha, etc.]	Screening outcome	Recommended IEE Threshold Decision
IR 1:						
					77778	
Subtotal (% of total budget)						
IR 2:						
				2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		
Subtotal (% of total budget)						
Grand Total %						



Step 5: Finalize threshold decisions, identify mitigation and monitoring

- Section 4.1: Recommended IEE determinations
 - Document your recommended threshold decision(s)
 - Includes any categorical exclusions identified during screening



Step 5: Finalize threshold decisions, identify mitigation and monitoring

- Section 4.2: Mitigation, Monitoring and Evaluation
 - Describe mitigation, monitoring and evaluation measures
 - Must address WHAT, WHO, HOW MUCH, WHEN and WHY
- Section 4.3: Summary table
 - Insert summary table, bullet list of key conditions



Step 6: Compliance Facesheet

- Form is self-explanatory
 - Basic activity or project information
 - New activity or amendment?
 - Recommended IEE determinations, including categorical exclusions
 - 1-2 paragraph precis of proposed activities



What do you do if you have large & Complex Multi Sector Proposals?

- Organize Sections 1, 3 & 4 by activities rather than by geographic location
 - describe locations in Sec. 2 and reference these locations in the other sections



An Iterative Process

In reality, IEE preparation is usually an ITERATIVE process

But you always begin by KNOWING your activities









Talk to People





DRAFT the Narrative Identify missing information

Look at Activities Again and Talk to More People



Revise the IEE Narrative



Make Threshold Decision Recommendations and fill out Facesheet



